

Response to Comments

July 15, 2021

To: The U.S. Environmental Protection Agency, Region 10, Seattle, WA

From: East Waterway Group

Re: Comments Received on the Revised East Waterway Anthropogenic Background Technical Memorandum, from Ravi Sanga, EPA Site Manager, on Thursday, July 1, 2021

Meeting on July 8, 2021, between EPA and EWG to discuss comments.

East Waterway Operable Unit Supplemental Remedial Investigation/Feasibility Study

EPA Comment 1

Page 4, last paragraph – EPA disagrees with adding the discussion regarding mixing of contamination left due to dredging limitations. If material left in place is problematic, or may be problematic to the performance and success of the remedy, then the remedy as envisioned by the EW FS is flawed and needs to be revised so that other arrangements are made to properly contain it. Given that EPA does not believe the remedy as presented in the EW FS, to be flawed, the last paragraph in the intro of Section 2 that begins with “in the long term...” needs to be deleted.

EWG Response: Per discussion with EPA, the first clause of the paragraph was retained for context; all other parts of the paragraph deleted per EPA comment. The last sentence of the section was combined with the retained clause.

EPA Comment 2

Page 11, third paragraph – Explain how turning basin data was considered when determining AB or reference the section where turning basin data is presented. It needs to be very clear in the AB Memo that data from the turning basin was not considered or used in calculating AB.

EWG Response: Per discussion with EPA, deleted the potentially misleading phrase “and was therefore considered in this analysis” in the commented paragraph. Additional clarification also added to Section 3.1.2.3.

EPA Comment 3

Page 19, third paragraph – The third paragraph in section 4.4 needs to be removed.

EWG Response: Per discussion with EPA, the paragraph was moved to uncertainty Section 5.8 and redundant text was deleted from Section 5.8. In addition, reference to Elliott Bay data in Section 4.4 and Table 4-5 was deleted per discussion with EPA. Table revisions are not shown in the redline/strikeout document.